UNITED STATES DISTRICT COURT DISTRICT OF WYOMING		
HOLLIE LUNDAHL, Plaintiff, - against - VISHAL GARG in his personal and official capacities, BETTER MORTGAGE CORPORATION and BOB BARKER, Defendants.	x : : :	19 Civ. 42 (J)
	-X	

DECLARATION OF SARA SIDDIQ

- I, Sara Siddiq, make this declaration pursuant to 28 U.S.C. § 1746 and declare that the following is true and correct based on my personal knowledge:
- 1. I am employed by Better Mortgage Corporation ("Better Mortgage") in the legal department; my title is Product Liaison and Program Manager.
- 2. Better Mortgage is a California corporation with a principal place of business at 250 Greenwich Street, 36th Floor, New York, NY 10006. It also maintains offices in California and India.
- 3. Vishal Garg is the Chief Executive Officer of Better Mortgage. He resides in New York and works at Better Mortgage's New York headquarters, where I also work.
- 4. Better Mortgage does not maintain in-person offices for its customers; instead, it transacts business with mortgage applicants entirely through its online portal, over email and other digital channels, and via the telephone.
- 5. Among my responsibilities is monitoring Better Mortgage's licensing status in each of the 50 U.S. states.

Case 2:19-cv-00042-ABJ Document 7-1 Filed 03/06/19 Page 2 of 2

Better Mortgage is currently licensed to originate home mortgages in 35 states; in 6.

the remaining states, Better Mortgage has applied for a mortgage origination license but its

application has not yet been granted.

7. Better Mortgage is not currently licensed in the state of Wyoming. As of today,

Better Mortgage's application for a mortgage origination license in the state of Wyoming

remains pending.

8. Better Mortgage does not issue mortgages in any state in which it does not have a

license to do so.

9. Better Mortgage engages in nationwide advertising but does not purchase ads

targeting states in which it is not licensed.

10. Attached hereto as Exhibit A is a true and correct screenshot of better.com, the

website for Better Mortgage, showing the company's response to a request for a mortgage for a

property address in Wyoming. The response states, "We're expanding, but we haven't reached

Wyoming yet."

11. In January 2019, Better Mortgage processed a mortgage application for Hollie

Lundahl, for a property located in South Dakota. Ultimately, Better Mortgage declined to issue

the mortgage.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York

March 6, 2019

2